

112 Grantham Court
Walkersville, MD 21793

March 26, 2003

William T. Sessions, Chief
Standardization Branch
Livestock and Seed Program
AMS, USDA, Room 2603-S, STOP 0254,
1400 Independence Ave, SW
Washington, DC 20250-0254

Dear Chief Sessions:

This letter is written to strongly suggest that you withdraw and reconsider USDA Agricultural Marketing Services' proposed livestock and meat marketing claims (Docket No. LS-02-02). Many of the claims and standards proposed therein will generate loopholes for industrial-style meat producers, mislead and confuse consumers, and have a negative impact on the livelihood of farmers who actually do raise antibiotic-free animals.

The three most egregious claims/standards pertain to the use of antibiotics in animal agriculture:

1. The claim no antibiotic residues avoids a question of much concern to consumers – the very real problem of antibiotic resistance. Although antibiotic residues in meat are not major causes of resistance, current law requires that meat producers subject animals to a period of withdrawal from antibiotics prior to slaughter to avoid antibiotic residue. Thus, the no antibiotic residues claim is confusing, but not substantive, and therefore could be abandoned.

2. The proposed claims not fed antibiotics and raised without antibiotics are extremely confusing to consumers. Not fed antibiotics can be claimed on any meat products from animals raised without "subtherapeutic" antibiotics, so meat producers who use large amounts of antibiotics for nontherapeutic purposes can still use this label. Unfortunately, most consumers will not be able to discern a difference between the claim not fed antibiotics, and the more stringent claim raised without antibiotics. The resulting confusion could bode badly for these consumers as well as for farmers who genuinely raise animals without antibiotics. The not fed antibiotics claim therefore should be withdrawn.

3. Finally, USDA has proposed that meat can be labeled grass fed, even if animals have received up to 20% of their nutrition from sources other than natural grazing. However, the grass fed claim and standard have definite implications for consumers concerned about antibiotic use.¹ The proposed grass fed label is therefore somewhat meaningless without clarification and could undermine farmers who incur the additional time and costs incurred in allowing cattle to fatten on a natural grass diet.

The above-noted labeling claims, therefore, seem to benefit those animal producers who will be able to co-opt desirable marketing claims without changing current practices. The losers if these claims are adopted will be not only consumers and the farmers and ranchers who make their living by providing meat from animals raised by alternative methods, but also anyone who is deprived of the benefit of antibiotics because of increasing antibiotic resistance. I therefore urge you to reexamine the claims and standards mentioned above.

Many thanks in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Isabel Slater', with a stylized flourish at the end.

Isabel Slater

¹ Cattle are often sent to industrial-style feedlots before slaughter to fatten them more quickly – a management technique that can cause disease. To prevent such disease, feedlot owners lace feed with antibiotics. In contrast, cattle that are grass fed throughout their lives require few antibiotics.